

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	)	Docket No. 3:21-MJ-28
	)	
	)	
v.	)	ELECTRONICALLY FILED
	)	
	)	
JEREMY VOROUS,	)	The Honorable Richard A. Lanzillo
	)	
Defendant.	)	

**MOTION TO CONTINUE PRELIMINARY EXAMINATION AND IDENTITY  
HEARING**

AND NOW, to-wit, comes the Defendant, Jeremy Vorous (hereinafter “Mr. Vorous”), by and through his attorney, Komron Jon Maknoon, Esq., and respectfully files the within Motion to Continue Preliminary Examination and Identity Hearing and, in support thereof, avers as follows:

1. On March 26, 2021, a complaint was filed alleging that Mr. Vorous violated 18 U.S.C. §§ 1752(a)(1) and (2), 1512(c)(2) along with 40 U.S.C §§ 5104(e)(2)(D) and (G). (*See* Doc. No. 1).
2. On that same day, undersigned counsel received a CJA appointment for the above-captioned case (*See* Doc. No. 4).
3. Currently scheduled and due are:
  - a. Preliminary Examination and Identity Hearing- April 1, 2021 at 2:00 p.m.
4. Additional time is needed for undersigned counsel to further discuss legal issues with his client to determine if undersigned counsel will proceed or waive.
5. On March 31, 2021, undersigned counsel spoke with Assistant United States Attorney Christian A. Trabold. via email who consented to the within Motion.

WHEREFORE, Mr. Vorous respectfully requests the within motion be granted and that the Preliminary Examination and Identity Hearing in the matter be continued to fifteen (15) days or a date deemed appropriate by this Honorable Court.

Respectfully submitted,

s/ Komron Jon Maknoon  
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